

Law Offices of Ezra Spilke

1825 Foster Avenue, Suite 1K  
Brooklyn, New York 11230  
t: (718) 783-3682  
e: ezra@spilkelaw.com  
www.spilkelaw.com

December 16, 2021

**BY ECF**

The Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *United States v. Constantinescu et al.*, No. 19 Cr. 651 (LTS)

Dear Judge Swain:

On behalf of defendants Ionela Constantinescu, Mircea Contantinescu, Cristian Costea, Peter Samolis, Iuliana Mihailescu and Florian Martin, and the Government we write to request a sixty-day adjournment of the upcoming status conference. Ms. Constantinescu and the above-named co-defendants are all out of custody.

The parties do not currently have any issues to raise with the Court. We are reviewing the voluminous discovery produced by the Government and exploring with our clients and the Government the possibility of pre-trial dispositions. Should the Court grant this request, we have no objection to an exclusion of time under the Speedy Trial Act through the re-scheduled date.

Respectfully submitted,

[Signatures on following page]

The foregoing adjournment request is granted. The Court hereby schedules the next conference in this matter for March 14, 2022, at 2:00pm. Speedy trial time has been excluded in this action through June 2022. Dkt. no. 942 resolved. SO ORDERED.  
12/16/2021  
/s/ Laura Taylor Swain, Chief USDJ

Hon. Laura Taylor Swain

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/s/ Ezra Spilke

Ezra Spilke  
Jacob Barclay Mitchell, Of Counsel  
1825 Foster Avenue Suite 1K  
Brooklyn, NY 11230  
(718) 783-3682  
Ezra@spilkelaw.com  
*Counsel for Ionela Constantinescu*

/s/ Jake Lasala

125-10 Queens Boulevard - Suite 320  
Kew Gardens, NY 11415  
(718) 261-7695  
Email: jlasalaesq@aol.com  
*Counsel for Cristian Costea*

/s/ Dawn Marcella Cardi

Cardi & Edgar LLP  
99 Madison Avenue, 8th Floor  
New York, NY 10016  
(212) 481-7770  
Email: DCardi@CardiEdgarLaw.com  
*Counsel for Iuliana Mihailescu*

/s/ Samuel Philip Rothschild

United States Attorney's Office  
One St. Andrew's Plaza  
New York, NY 10007  
212-637-2504  
Email: samuel.rothschild@usdoj.gov  
*Counsel for the Government*

/s/ Meredith Stacy Heller

Law Office of Meredith S. Heller PLLC  
99 Park Avenue, PH Suite  
New York, NY 10016  
(646) 661-1808  
Email: msheller@mshellerlaw.com  
*Counsel for Mircea Constantinescu*

/s/ Michael H. Sporn

Law Office of Michael H. Sporn  
299 Broadway Suite 800  
New York, NY 10007  
(212) 791-1200  
Email: mhsporn@gmail.com  
*Counsel for Peter Samolis*

/s/ Edward Vincent Sapone

Sapone & Petrillo, LLP  
40 Fulton Street  
17th Floor  
New York, NY 10038  
(212) 349-9000  
Email: ed@saponepetrillo.com  
*Counsel for Florian Claudiu Martin*

cc: All counsel of record by ECF